

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
NORTHERN DIVISION

<i>RACHEL HILLARY TRUMP,</i>)	
)	
Plaintiff,)	
)	
v.)	
)	Cause No. 2:17-cv-00042-CDP
<i>BILL MORGAN, et al.,</i>)	
)	
Defendant)	
)	

DEFENDANT CYNTHIA JOHNSON'S
MEMORANDUM IN OPPOSITION TO
PLAINTIFF'S RENEWED MOTION TO APPOINT COUNSEL

Defendant Cynthia Johnson ("Johnson"), through her undersigned counsel, states the following in opposition to Plaintiff's Renewed Motion to Appoint Counsel [Doc. #47]:

Plaintiff was asked point blank in her deposition why she did not have any legal representation, in light of her claim she had spoken to a number of attorneys. [Trump Depo. at 133:4]. Plaintiff's response: "I honestly don't feel like I need it." [*Id.* at 133:5].¹

Plaintiff's renewed motion for appointment of counsel is intended to delay proceedings and the Court's entry of summary judgment. Discovery has closed. Plaintiff responded to Defendant Morgan's discovery but she failed to respond to Defendant Johnson's discovery including providing signed record release authorizations for medical

¹ Plaintiff's renewed motion for appointment of counsel [Doc. # 47] should also be denied because nothing has materially changed since the Court denied her prior request [Doc. # 30].

records. In response to Defendant Johnson's summary judgment motion, Plaintiff offers no evidence to controvert Johnson's statements of facts and makes no attempt to support her claims against Johnson.

WHEREFORE, Defendant Cynthia Johnson respectfully requests the Court deny Plaintiff's renewed motion. [Doc. # 47].

SANDBERG PHOENIX & von GONTARD P.C.

By: /s/ Casey F. Wong
Stephen M. Strum, 37133
Casey F. Wong, #62258
600 Washington Avenue - 15th Floor
St. Louis, MO 63101-1313
314-231-3332
314-241-7604 (Fax)
E-mail: sstrum@sandbergphoenix.com
cwong@sandbergphoenix.com

Attorneys for Defendant Cynthia Johnson

Certificate of Service

I hereby certify that on the 9th day of April 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties.

Jacob D. Aubuchon
Assistant Attorney General
Jacob.aubuchon@ago.mo.gov
Attorney for Defendant Bill Morgan

I hereby certify that on the 9th day of April 2019, the foregoing was mailed by United States Postal Service to the following non-participants in Electronic Case Filing:

Rachel Hillary Norris-Trump
Register #357387
Women's Eastern Reception
Diagnostic & Correctional Center
1101 East Highway 54
P.O. Box 300
Vandalia, MO 63382
Pro Se Plaintiff

/s/ Casey F. Wong